

REMARKS

In the Office Action, claims 1-38 were rejected. Claim 1 has been amended by this Response. In addition, claim 4 has been canceled. Upon entry of the amendments, claims 1-3 and 5-38 will be pending in the present patent application. Reconsideration and allowance of all pending claims are requested.

Rejections under 35 USC § 112

Claim 4 was rejected under 35 U.S.C 112, second paragraph, as being indefinite for failing to particularly point out and distinctly claim the subject matter which applicant regards as the invention. Similarly, claim 4 was rejected under 35 U.S.C 112, first paragraph, as failing to comply with the written description requirement.

Applicants have canceled claim 4. The rejections on this basis are therefore moot.

Defects in Examiner's Response

The Examiner rejected claims 1-6, 9-14, 16, 18-20, 22-23, 26, 28, 30-32, 34-35 and 38 under 35 U.S.C 102(e) as being anticipated by U.S Patent No. 2003/01063039 A1 (hereinafter "Rosnow"). The Examiner rejected claims 8, 15, 17, 24-25, 27, 29 and 36-37 under 35 U.S.C 103(a) as being unpatentable over Rosnow in view of Patent No. 6, 301, 516 B1 (hereinafter "Ostrowski").

Defects in the Formulation of the Rejections.

Therefore, it is implicit in the Examiner's rejection of claims 15 and 27 that Rosnow fails to teach all of the elements of the claims 15 and 27 (as these were rejected only in view of the combination). Consequently, Rosnow alone cannot possibly teach all of the elements of the claims depending from claims 15 and 27, namely, 16, 18-20, 22-23, 26, 28, 30-32, 34-35 and 38 (which were apparently only rejected in view of Rosnow alone). It is believed that the Examiner intended to reject these claims in view of Rosnow in combination with Ostrowski.

However, to support a *prima facie* case that rejection, the Examiner must necessarily set forth why and how that combination would be made for each of those claims. Therefore, the Examiner has not established a *prima facie* case of obviousness of at least the claims 16, 18-20, 22-23, 26, 28, 30-32, 34-35 and 38 depending from claims 15 and 27 respectively. Applicants specifically request that the Examiner formulate a proper rejection in a subsequent non- final office action, so that Applicants may be given a fair opportunity to respond.

Similarly, the Examiner rejected claims 21 and 33 under 35 U.S.C. 103(a) as being unpatentable over Rosnow in view of U.S Patent No. 2003/0055897A1 (hereinafter "Brown"). However, again the Examiner admitted that Rosnow cannot alone support a rejection of claims 15 and 27 and that Ostrowski would be needed for that. Therefore, it is believed that the rejection should have been formulated in view of Rosnow, Ostrowski and Brown in combination. However, to support a *prima facie* case that rejection, the Examiner must necessarily set forth why and how that combination would be made for each of those claims. Therefore, the Examiner has not established a *prima facie* case of obviousness of at least claims 21 and 33 depending from claims 15 and 27 respectively.

In addition, the Examiner stated in section 37 of the Office Action that claims 27-38 did not teach or define any new limitations beyond the above claims and rejected them as above. Applicants do not understand the meaning or relevance of this statement (unsupported and general as it is) and it will not be addressed in this Response.

Rejections in view of art

Independent claim 1 was rejected as being anticipated by Rosnow. Claim 1 recites a system for performing synchronous quality function deployment (QFD) over a computer network. The computer network includes a real-time server, a lightweight thin client server, a data storage device, and at least two client systems. The system comprises a QFD tool. The QFD tool includes a "Create New QFD" session component and an

“Active QFD session” component. The active QFD session component provides a *common area operable for facilitating collaboration among session members* via computer screens of the at least two client systems. The QFD tool further includes a “Finished QFD session” component and a “Scheduled QFD session” component. The lightweight thin client server executes the QFD tool and the at least two client systems access the QFD tool in real time via the real-time server.

The Examiner indicated that similar steps were present in Rosnow. However, Rosnow does not anticipate the system of claim 1 for at least the reasons set forth below.

Claim 1 has been amended by this Response. The amendment adds that the active QFD session component provides a common area operable for facilitating collaboration among session members via computer screens of at least two client systems. Applicants note that this feature was already recited in claims 15 and 27. At least these recitations are not taught by Rosnow.

Rosnow discloses a computer-implemented system and method for evaluating, planning and implementing a project from conceptualization to market introduction.

The Examiner contended that Rosnow discloses a common area operable for facilitating collaboration among session members via computer screens of at least two client systems. In formulating a rejection of this feature in claims 15 and 27, the Examiner referred to page 6, paragraph 56 of Rosnow. Applicants have carefully reviewed this section and submit that this paragraph, and indeed the reference as a whole, fails to teach or disclose a technique for providing any kind of collaborative environment or common area. Specifically, at page 6 paragraph 56, Rosnow states:

The Lotus Workflow 403 is a stand alone product that works on top of Domino and provides users the ability to develop, manage, and monitor business processes and help them eliminate the downfalls of paper-based

work. Lotus Workflow includes several major bundled components, discussed below.

Clearly, the above passage in no way relates to a common area operable for facilitating collaboration among session members via computer screens of at least two client systems. The common area disclosed in the present patent application permits collaboration between multiple users that is facilitated by the fact that the QFD tool executes on the thin client server, while the client systems access the QFD tool in real time via the real time server.

Because Rosnow does not disclose at least, providing a common area operable for facilitating collaboration among session members via computer screens of at least two client systems, the reference cannot anticipate claims 1, 15 or 27. Accordingly, claims 1, 15 and 27 and the claims depending therefrom are believed to be clearly patentable over Rosnow as well as other prior art of record.

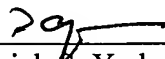
Ostrowski and Brown were not cited by the Examiner to disclose a common area operable for facilitating collaboration among session members via computer screens of said at least two client systems. Applicants have reviewed the Ostrowski and Brown references and submit that these references fail to disclose a common area operable for facilitating collaboration among session members via computer screens of said at least two client systems.

Conclusion

In view of the remarks and amendments set forth above, Applicants respectfully request allowance of the pending claims. If the Examiner believes that a telephonic interview will help speed this application toward issuance, the Examiner is invited to contact the undersigned at the telephone number listed below.

Respectfully submitted,

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